

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Advanced Television Systems and their)	MB Docket No. 87-268
Impact upon Existing Television)	
Broadcast Service)	
)	
)	
)	
)	

To: The Commission
ELECTRONICALLY SUBMITTED

COMMENTS OF
SAGA QUAD STATES COMMUNICATIONS, LLC

Saga Quad States Communications, LLC (“Saga”), licensee of KOAM-DT, Pittsburg, Kansas, respectfully files these comments on the *Eleventh Further Notice of Proposed Rulemaking*, FCC 06-150, released on October 20, 2006 (“*Further Notice*”).¹ At paragraph 16 of the *Further Notice*, the Commission specifically requested “that licensees review the accuracy of their information contained in the proposed DTV

¹ Comments were due January 11, 2007, and reply comments were due February 26, 2007 (See *Order*, DA 07-38, released January 9, 2007). Due to administrative oversight, comments were not timely submitted. Saga’s management recently realized that no comments were filed and seeks to bring the matters to the Commission’s attention. Saga is today filing a Motion to Accept Late-Filed Comments.

Table and Appendix B . . . and comment on any inaccuracies or discrepancies.”

Notwithstanding the delay in filing these “Comments,” the extraordinary significance of the material submitted, and the severe impact that would result on the operations of KOAM-DT and the population served thereby, the public interest requires that the information submitted be accepted and considered in this proceeding.

Given the volume of comments and reply comments submitted in this proceeding, including extensive technical data, and considering the monumental engineering analyses that will be required to coordinate the data submitted, it is Saga’s hope that any delay occasioned by the acceptance of Saga’s “Comments” at this time would be minimal and would be justified by the public’s interest.

Background

Saga is licensee of KOAM-TV, Channel 7, Pittsburg, KS (Facility ID#58552). KOAM-TV analog operates with an ERP of 316 kW omnidirectional at an HAAT of 332m. In its *Sixth Report and Order*,² the Commission allotted KOAM-TV DTV operation on Channel 30 with an ERP

² 12 FCC Red 14588 (1997).

of 667.9 kW (omni) at an HAAT of 332m to replicate the KOAM-TV analog coverage. Since most of the TV stations in the area were VHF, Saga filed a rule-making petition to change the DTV allotment to Channel 13. This petition was granted but the CH13 ERP was limited to 4.2 kW omni-directional because of interference issues. As set out in the attached Engineering Statement, however, this 4.2 kW facility did not replicate the KOAM analog facility but Saga's technical consultants at the time thought that post-transition, the interference issues would disappear and the ERP could be increased. All stations had the option of certifying to either the coverage of their allotment facility or a maximized DTV facility. Saga did not have a "maximized facility," so its choice was limited to the 4.2 kW allotment. When it became apparent that the post transition scenario would still limit KOAM-DT to 4.2 kW (omni), Saga elected its analog CH7 for DTV. The coverage of the 4.2 kW allotment facility on Channel 13 is the same on CH7. The *Seventh Further Notice of Proposed Rule Making* tentatively assigns KOAM-DT a Channel 7 facility with an ERP of 4.2 kW (omni) at an HAAT of 340 m.

As demonstrated in the attached Engineering Statement, however, an ERP of 15.33 kW (omni) at an HAAT of 340m on Channel 7 is necessary to replicate the original KOAM-TV analog coverage. The result of this tentative allotment is that there will be a loss of service to nearly 95,000 people (17%) KOAM-TV presently serves with its analog facility. Saga desires to match its

analog coverage as closely as possible so that it can continue serving the majority of those people.

Interference Issues

A post-transition interference study of the tentative allotment facility was compared to a 15.33 kW omni-directional facility at an HAAT of 340 m using software that emulates that used by the FCC. The results of that study revealed that there would be impermissible interference (greater than 0.1%) to KQTV-DT, St. Joseph, MO. A new study was run using a directional antenna to limit the ERP in the direction of KQTV-DT. The results of that study shows that the proposed directional antenna protects KQTV-DT such that there is no increase in interference; no other DTV station is predicted to receive interference that is greater than 0.1%.

Public Interest Considerations

Population (2000 Census) figures for the KOAM-TV analog facility, the KOAM-DT tentative allotment, and the proposed 15.33 kW directional facility show that if Saga were allotted a directional facility like that described above, it could provide service to 94.4% of the persons it presently serves with its analog facility without impermissible interference to any other station. As shown in the Engineering Statement, there is a negative differential of **103,522** persons between the population served by the KOAM-TV analog facilities and the KOAM-DT digital facility

using 4.2 kW. The potential to replicate its Grade B analog service with DTV service, and so to avoid this loss of service, would serve the public interest.

Request for Change to Appendix B

Saga respectfully requests the Commission to amend the proposed Table of Allotments in **Appendix B, Page 150, Line #1**, to include the operating parameters for KOAM-DT as follows:

	<u>Present Tentatively Assigned Allotment</u>	<u>Proposed</u>
City of license	Pittsburg, KS	Pittsburg,
KS		
Channel	7	7
ERP	4.2 kW (Omni)	15.33 kW (DA)
HAAT	340m	340m
Latitude	37°-13'-15"	37°-13'-15"
Longitude	94°-42'-25"	94°-42'-25"

Respectfully submitted,

SAGA QUAD STATES
COMMUNICATIONS, LLC

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ATTACHMENT
ENGINEERING STATEMENT UPLOADED
SEPARATELY